

# *U.S. NUCLEAR REGULATORY COMMISSION*

## ***DIRECTIVE TRANSMITTAL***

TN: DT-96-24

**To:** NRC Management Directives Custodians

**Subject:** Transmittal of Management Directive 3.55, "Forms Management Program"

**Purpose:** Directive and Handbook 3.55 replace Manual Chapter and Appendix 0233 and were revised to streamline the contents in conformance with the Paperwork Reduction Act and to include new guidelines regarding electronic forms.

**Office and Division of Origin:** Office of Information Resources Management

**Contact:** Beverly Martin, 415-5877

**Date Approved:** August 13, 1996

**Volume:** 3 Information Management

**Part:** 2 Records Management

**Directive:** 3.55 Forms Management Program

**Availability:** U.S. Government Printing Office, (202) 512-2409

# ***Forms Management Program***

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***Directive***  
*(Formerly* **3.55**  
*MC 0233)*

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# U. S. Nuclear Regulatory Commission

Volume: 3 Information Management  
Part: 2 Records Management

IRM

## Forms Management Program Directive 3.55

### Policy (3.55-01)

It is the policy of the U.S. Nuclear Regulatory Commission to prepare, control, and process all official forms in accordance with the Paperwork Reduction Act of 1995, the Privacy Act of 1974, and the regulations of the General Services Administration (GSA) on the procurement and use of U.S. Government Standard and Optional Forms.

### Objectives (3.55-02)

- To ensure that, whenever possible, all new NRC forms will be developed and used in an exclusively electronic format. (021)
- To ensure that the production, use, and distribution of forms are efficient and economical. (022)
- To ensure the NRC's creation and use of forms are consistent with Federal standards (41 CFR 201-9.1 and 201-9.2) and the agency's needs. (023)

### Organizational Responsibilities and Delegations of Authority (3.55-03)

#### Office of the General Counsel (OGC) (031)

Reviews all Privacy Act statements for NRC forms to ensure that they are legally sufficient and in accordance with the act.

**Volume 3, Part 2 – Records Management  
Forms Management Program  
Directive 3.55**

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**Chief, Information and Records Management  
Branch (IRMB), Office of Information Resources  
Management (IRM)  
(032)**

Administers the NRC forms management program, including:

- Serving as the headquarters forms liaison to coordinate headquarters forms activities. (a)
- Coordinating forms clearance actions and other forms management oversight responsibilities with GSA, the Office of Management and Budget (OMB), and other Government agencies, as appropriate. (b)
- Pursuant to the Privacy Act of 1974, ensuring that Privacy Act statements are included on forms that request personal information from individuals. (c)
- Coordinating the automation of NRC, Standard, and Optional Forms to ensure the designs are user friendly and that only current forms are installed on the NRC local area network. (d)

**Regional Administrators  
(033)**

- Appoint a forms liaison officer to coordinate regional forms activities with IRMB and provide the name of this person, and the name of any replacement, to IRMB, IRM. (a)
- Approve local forms to be used within the region. (b)

**Director, Division of Facilities and  
Property Management (DFPM), ADM  
(034)**

- Initiates requests to procure all U.S. Government Standard and Optional Forms that are required for NRC headquarters use from the GSA. (a)
- Maintains inventory of printed stock of NRC and U.S. Government Standard and Optional Forms at the NRC warehouse and supply room. (b)

**Director, Division of Freedom of  
Information and Publications  
Services (DFIPS), ADM  
(035)**

Approves the substantive content of Privacy Act statements for inclusion on forms, and notifies IRMB of proposed, revised, and reprinted forms requiring a Privacy Act Statement.

**Applicability**  
(3.55-04)

The policy and guidance in this directive and handbook apply to all NRC employees.

**Handbook**  
(3.55-05)

Handbook 3.55 contains standards, guides, and procedures for management and control of forms within the NRC.

**Definitions**  
(3.55-06)

**Local Form.** A form approved by an administrator of a regional office for use within that region and identified as such. (061)

**Optional Form (OF).** A form developed and recommended for use by two or more Federal agencies. The OF is normally generated because of a common functional need or convenience and is approved by GSA for nonmandatory use (see 41 CFR 201-9.202-1.). NRC or local forms will not be developed for use if an OF is available and can be used to satisfy the NRC requirement. (062)

**Public-Use Forms.** Reports, applications, questionnaires, interview guides, and other forms used to collect information from the public for use in regulatory programs. Such forms are subject to Office of Management and Budget (OMB) clearance under 44 U.S.C. 3507, if they affect 10 or more persons. (063)

**Standard Form (SF).** A form prescribed by a Federal agency, pursuant to its authority, and approved by GSA or OMB for mandatory use by all Government agencies (see 41 CFR 201-9.202-1). This mandatory use is generally set forth in the regulations of the prescribing agency. (064)

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**References**  
(3.55-07)

*Code of Federal Regulations—*

“Controlling Paperwork Burdens on the Public; Regulatory Changes Reflecting Recodification of the Paperwork Reduction Act,” 5 CFR 1320 (60 FR 44978; August 29, 1995).

“Federal Information Resources Management Regulations System,” 41 CFR 201-9.1 and 9.2.

“Standard and Optional Forms Management Program,” 41 CFR 201-9.202-1.

*General Services Administration Information Resources Management Handbooks—*

“Forms Analysis and Design,” Student Manual.

“Forms and Guide Letters,” 1973, Stock Number 7610-00-117-8777.

“Forms Management,” 1985, Stock Number 7610-00-142-9363.

“Specialty Forms,” 1974, Stock Number 7610-00-133-5844.

“NRC Forms Facsimile Handbook,” NUREG/BR-0062.

NRC Management Directive 3.54, “Collections of Information and Reports Management.”

Office of Management and Budget, “Instructions for Requesting OMB Approval Under the Paperwork Reduction Act of 1995,” October 1995.

Paperwork Reduction Act of 1995 (44 U.S.C. 3501, et seq.).

Privacy Act of 1974 (5 U.S.C. 552a).

“Public Printing and Documents” (44 U.S.C. Chapters 21, 25, 27, 29, 31, and 35).

# ***Forms Management Program***

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***Handbook***  
(Formerly  
Appendix 0233) **3.55**

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## Part I

# Requesting Forms Management Services

### Development (A)

Organizational units at headquarters or forms liaison officers in the regions initiating or revising a form should determine that—

- The information requested is essential and it is not available from another source (i.e., an existing form, report, or a record used for other purposes). (1)
- The cost of collecting the information is reasonable and is worth the benefits to be derived. Consider the number of staff hours required of all persons who will compile, enter, transmit, review, and file the information when computing costs. (2)
- Each data element on the form is necessary. Combine data elements where practicable and eliminate those that are not essential. Data elements on a form that pertain to information about an individual must be relevant and compatible to statutory requirements or Executive orders. (3)
- Requirements have been established for the number of users, frequency of use, and estimated annual use rate. (4)
- The proposed distribution of the completed form is essential. Keep the distribution to a minimum. (5)

### Requesting or Reprinting an NRC Form (B)

#### A New Form (1)

Unless otherwise requested from the originator, any new NRC form will be automated and the electronic form will be coordinated for

## **Requesting or Reprinting an NRC Form (B) (continued)**

implementation into the NRC local area network. When required, all forms in electronic format also will contain a Privacy Act statement. (a)

The originator shall request a new form by completing all applicable data elements on NRC Form 160, "Request for Forms Management Services," and transmitting it with a copy of the rough draft of the proposed new form to the Information and Records Management Branch (IRMB), Office of Information Resources Management (IRM), in sufficient time to allow processing. (See Part III(A) of this handbook for lead time.) The justification shall include the prescribing regulation, management directive, or other instruction. (See Exhibit 1 for a sample of a completed request.) (b)

If the proposed form solicits personal information about an individual, the originator must send the form for review to the Freedom of Information/Local Public Document Room (FOI/LPDR) Branch, Office of Administration (ADM). If LPDR staff determine the need for a statement pursuant to the Privacy Act of 1974, LPDR staff will draft a Privacy Act statement, obtain review and concurrence from the Office of General Counsel, and return the form with the approved statement to the originator. The originator will attach the approved Privacy Act statement to NRC Form 160 before submitting it to IRMB. (c)

### **A Revised Form (2)**

Organizational units at headquarters or forms liaison officers in the regions shall request a revision to an NRC form by a written request to IRMB via a completed NRC Form 160, a memorandum, or an E-mail. Revisions also may be requested at the time IRMB sends NRC Form 162, "Request for Review of Form," to the originator for review before replenishing low stock of the inventory (see Exhibit 2).

### **Reprinting a Form (3)**

Organizational units at headquarters or forms liaison officers in the regions shall request reprinting of an NRC form by a written request to IRMB via a memorandum or an E-mail or by returning an NRC Form 162.

## **Form Approval (C)**

IRMB shall review and approve each request for forms management services related to a new or existing form before designing a new form for automation and/or printing an existing form. IRMB's review shall—

- Determine whether or not proposed data are available from another source (1)
- Determine whether the form will be agency controlled (2)
- Determine whether the form will be automated (3)
- Ensure that continued use is warranted (4)
- Determine the need for coordination with other NRC offices or other Federal agencies (5)

## **Request for Exception to U.S. Government Standard Form Use (D)**

Organizational units at headquarters or forms liaison officers in the regions requesting exception to the required use of U.S. Government Standard forms shall submit requests to IRMB (see Part II(B) of this handbook for more information).

## **Design and Construction Standards (E)**

IRMB, to the extent practicable, shall incorporate standard design practices in use throughout the Federal Government when reviewing new or revised forms. These practices are described in the General Services Administration (GSA) Information Resources Management Handbook, "Forms Analysis and Design."

## **Discontinuance of Existing Form (F)**

Organizational units at headquarters or forms liaison officers in the regions shall promptly notify IRMB in writing, by memorandum or E-mail, when a form becomes obsolete.

## **Part II**

# **Requesting Review and/or Clearance From Other Federal Agencies**

### **Public-Use Forms (A)**

Under the provisions of the Paperwork Reduction Act of 1995, an agency may not collect information that solicits answers to identical questions posed to, or identical reporting or recordkeeping requirements imposed on, 10 or more persons, other than agencies, instrumentalities, or employees of the United States, without first obtaining approval from the Office of Management and Budget (OMB). (1)

Organizational units at headquarters and forms liaison officers in the regions proposing a form requiring OMB review shall submit a request, completed in accordance with NRC Management Directive 3.54, "Collections of Information and Reports Management," to the Information and Records Management Branch (IRMB), Office of Information Resources Management (IRM), in sufficient time to ensure the established milestone schedules are met for—(2)

- Publishing the Federal Register notice with a 60-day public comment period and a 30-day comment resolution period (a)
- Publishing a second Federal Register notice with a 60-day public comment and OMB review period (b)

The request should include a narrative supporting statement, proposed form, a Federal Register notice, and other related documents, as appropriate. (3)

## **U.S. Government Standard and Optional Forms (B)**

The Federal Information Resources Management Regulations (FIRMR) set forth procedures for—(1)

- Prescribing Standard forms for mandatory use by all Federal agencies (a)
- Adopting an Optional Form for use by more than one Federal agency (b)
- Making revisions to Standard or Optional Forms (c)
- Requesting exception to use an agency form rather than a Standard form (d)
- Requesting exception to electronically generate a Standard or Optional Form rather than using a printed version of the form (e)

Organizational units at headquarters and forms liaison officers in the regions proposing any of these actions shall submit a written request (E-mail is acceptable), along with a supporting statement (see Exhibit 3 for an example of a supporting statement), to IRMB in sufficient time to allow the General Services Administration 60 days processing time. (2)

## **Other Federal Agency Forms (C)**

There is a limited number of forms from other Federal agencies prescribed for use within NRC. Direct any questions regarding the use of other agency forms to IRMB.

## **Part III**

# **Forms Processing, Printing, Procurement, Supply, and Stocking**

### **Processing and Printing Time (A)**

The processing time for review, analysis, design, approval of design, required clearances, and printing (if not an automated format) depends on the complexity of the individual form. Sufficient lead time will be based on the following criteria:

- Simple, single sheet forms to be printed by the Printing, Graphics, and Mail Services Branch (PGMSB), Office of Administration (ADM), require 1 to 2 weeks, depending on the PGMSB workload. (1)
- Forms printed by the Government Printing Office require 6 to 8 weeks because of their complexity or large quantity. (2)
- Specialty forms (carbon interleaved sets, chemical transfer sets, marginally punched continuous forms, etc.) require 8 to 10 weeks because they must be contracted to commercial printers for reproduction. (3)
- Allow an additional processing time of 60 days or more when outside clearances are necessary (e.g., from the General Services Administration [GSA] or the Office of Management and Budget). (4)

### **Procurement (B)**

#### **U.S. Government Standard and Optional Forms (1)**

NRC headquarters organizations shall submit requests for Standard and Optional Forms on NRC Form 30, "Request for Administrative Services," to the Property Management Branch (PMB), ADM. (a)

## Procurement (B) (continued)

Regional offices shall obtain Standard and Optional Forms from the GSA stores depot servicing their area, in accordance with established GSA procedures. (b)

### Other Federal Agency Forms (2)

NRC headquarters organizations shall submit requests for forms of other Federal agencies through the Information and Records Management Branch (IRMB), Office of Information Resources. (a)

Regional offices shall submit requests to the appropriate agencies. Regional offices may contact IRMB for assistance in locating the appropriate staff, address, and/or telephone listings of other agencies, if necessary. (b)

## Supply and Stocking (C)

- As forms automation progresses, paper stock of NRC forms will no longer be maintained. Automated NRC forms will be accessible on the Local Area Network using the forms automation icon in the NRC AUTOS window. (1)
- PGMSB, ADM, will centrally print paper stock of NRC forms used throughout headquarters and/or regional offices. (2)
- Automated and printed NRC and U.S. Government Standard and Optional Forms are listed alphabetically by form title and numerically by NRC U.S. Government Standard and Optional Form number in the "NRC Forms Facsimile Handbook." (3)
- IRMB determines stock levels necessary for procuring or reordering printed forms. Generally, printed forms are ordered in sufficient quantities to satisfy NRC requirements for 1 year. However, quantities can be procured that last beyond 1 year when proven to be more economical or when the form is not likely to be modified. (4)
- As standard practice, PMB, ADM, physically stocks, inventories, and issues all printed NRC forms (except as identified under item (8) below). PMB shall provide IRMB with continuous inventory control of forms. (5)



## **Supply and Stocking (C) (continued)**

- When individual NRC forms are scheduled to be restocked or reprinted, IRMB shall transmit to the responsible organizational unit a copy of NRC Form 162, "Request for Review of Form," to determine currentness and continued need. When appropriate, NRC Form 162A is sent concurrently to FOI/LPDR to review the form for Privacy Act relevancy. (See Exhibit 2 for samples of NRC Forms 162 and 162A). (6)
- In the "WHAT'S NEW" section of the forms automation software, IRMB will announce the new and revised forms, their stocking points, new forms management policies, and any forms announcements that may affect NRC's goals and objectives. To access this section, click on the "WHAT'S NEW" button on the main menu of the forms automation software, which is located in AUTOS. (7)
- In specialized situations, it is both economical and practical to have the NRC headquarters program office or regional office maintain stock. This occurs when the office is the sole NRC user of a form and the annual usage and storage requirements do not impose retention problems. The offices maintaining forms stock should reorder forms in sufficient time to ensure that stock is never depleted. Offices should request revisions to forms for which they maintain stock in accordance with Part I(B) of this handbook. Where no changes are involved, offices should submit to IRMB a written request (E-mail or memorandum) to reprint a form. (8)

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## Exhibit 1

# NRC Form 160, "Request for Forms Management Services"

<b>NRC FORM 160</b> (2-96) NRCMD 3.55		<b>U.S. NUCLEAR REGULATORY COMMISSION</b>		<b>1. DATE OF REQUEST</b> MM/DD/YY		<b>2. DATE DELIVERY REQUESTED</b> MM/DD/YY																											
<b>REQUEST FOR FORMS MANAGEMENT SERVICES</b>				<b>3. FORM NUMBER (if available)</b> NRC Form 160		<b>4. PRESCRIBING DIRECTIVE (if applicable)</b> NRCMD 3:55																											
<b>5. FROM (PERSON TO CONSULT FOR REFERENCE)</b> First M. Last				<b>6. ACTION REQUESTED (Check as appropriate)</b> <input type="checkbox"/> NEW <input checked="" type="checkbox"/> REVISION This form supersedes Form No.																													
<b>OFFICE/DIVISION/BRANCH</b> OFF/DIV/BR		<b>MAIL STOP</b> T-6 F33		<b>TELEPHONE NUMBER</b> 415-NNNN		<b>8. DISPOSITION OF EXISTING STOCK (if a revision)</b> <input checked="" type="checkbox"/> USE FIRST <input checked="" type="checkbox"/> DESTROY <input type="checkbox"/> IMMEDIATELY <input type="checkbox"/> WHEN NEW STOCK IS RECEIVED SPECIFIC DATE:																											
<b>7. TITLE OF FORM</b> Request for Forms Management Services				<b>9. JUSTIFICATION</b> EXPLAIN THE NECESSITY AND INTENDED USE OF A NEW OR REVISED FORM OR THE REASON THAT THE FORM SUPERSEDES ANOTHER FORM. This form must be revised to reflect additional information required by the Paperwork Reduction Act of 1995.																													
<b>10. PRIVACY ACT STATEMENT REQUIRED</b> <input checked="" type="checkbox"/> YES If proposed form solicits an individual's social security number or other personal data subject to the Privacy Act of 1974, specify purpose and uses of this data in Block 9 above. (If additional space is required, continue on the reverse or a separate sheet.) <input type="checkbox"/> NO				<b>11. CONSTRUCTION OF THE FORM</b> <input checked="" type="checkbox"/> SHEET <input type="checkbox"/> PAD (____/PAD) <input type="checkbox"/> UNIT SET (____ PARTS) <input type="checkbox"/> MULTI-SET (____ PAGES) <input type="checkbox"/> CARD <input type="checkbox"/> MARGINAL ADP TABS-CONTINUOUS FEED <input type="checkbox"/> OTHER (Specify)																													
<b>12. FORM STOCKING POINT</b> <input checked="" type="checkbox"/> ORIGINATING OFFICE <input type="checkbox"/> WAREHOUSE AND SUPPLY <input type="checkbox"/> WAREHOUSE <input checked="" type="checkbox"/> OTHER (Specify) LAN (electronic format)		<b>13. ORGANIZATIONS COMPLETING THE FORM</b> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <th style="text-align: left;">A. PUBLIC EMPLOYEES</th> <th style="text-align: left;">B. PUBLIC</th> </tr> <tr> <td> <input checked="" type="checkbox"/> NRC-WIDE  <input type="checkbox"/> HEADQUARTERS  <input type="checkbox"/> ORIGINATING OFFICE         </td> <td> <input type="checkbox"/> REGIONAL  <input type="checkbox"/> OTHER AGENCIES  <input type="checkbox"/> OTHER (Specify)         </td> </tr> <tr> <td> <input type="checkbox"/> CONTRACTOR  <input type="checkbox"/> LICENSEE  <input type="checkbox"/> OTHER (Specify)         </td> <td></td> </tr> </table>						A. PUBLIC EMPLOYEES	B. PUBLIC	<input checked="" type="checkbox"/> NRC-WIDE <input type="checkbox"/> HEADQUARTERS <input type="checkbox"/> ORIGINATING OFFICE	<input type="checkbox"/> REGIONAL <input type="checkbox"/> OTHER AGENCIES <input type="checkbox"/> OTHER (Specify)	<input type="checkbox"/> CONTRACTOR <input type="checkbox"/> LICENSEE <input type="checkbox"/> OTHER (Specify)																					
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<b>14. METHOD OF COMPLETING ENTRIES</b> <input checked="" type="checkbox"/> HAND <input checked="" type="checkbox"/> TYPEWRITER <input checked="" type="checkbox"/> ADP EQUIPMENT <input type="checkbox"/> OTHER (Specify)		<b>15. FREQUENCY OF USE</b> <input type="checkbox"/> DAILY <input type="checkbox"/> WEEKLY <input type="checkbox"/> MONTHLY <input type="checkbox"/> QUARTERLY <input checked="" type="checkbox"/> ANNUALLY <input type="checkbox"/> ONE TIME ONLY <input checked="" type="checkbox"/> OTHER (Specify) Intermittent		<b>16. ESTIMATED ANNUAL USAGE</b> 100 <b>17. QUANTITY REQUESTED</b> 100 <b>18. SIZE</b> 8 1/2" x 11"																													
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<b>AUTHORIZING OFFICIAL - SIGNATURE</b>		<b>TITLE</b> Title of Authorizing Official		<b>RETURN COMPLETED FORM TO:</b> FORMS ANALYST IRM/IRMS (T-6 F33)																													

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## Exhibit 2

### NRC Form 162, "Request for Review of Form"

NRC FORM 162 5-49 NRCMS 3.55		U.S. NUCLEAR REGULATORY COMMISSION		DATE OF REQUEST MM/DD/YY	
<b>REQUEST FOR REVIEW OF FORM</b>				DUE DATE MM/DD/YY	
<input type="checkbox"/> NEW <input checked="" type="checkbox"/> REORDER <input type="checkbox"/> SPECIAL – OMB CLEARANCE					
TO:  FIRST LAST ORGANIZATION MAIL STOP			FROM AND RETURN TO:  FIRST LAST ORGANIZATION MAIL STOP		
FORM NUMBER NRC 000			TELEPHONE 415-NNNN		
EDITION DATE MM/YY			TITLE OF FORM		
Please review this form and return it to the Information and Records Management Branch by the due date specified to maintain an operating level of the subject form. If this form is not received by the due date, a year's supply of the form will be reordered without change. Check or complete the items below as appropriate.					
FORM IS CURRENT AND NO REVISIONS ARE ANTICIPATED FOR AT LEAST 1 YEAR.				DISPOSITION OF EXISTING STOCK (Complete for revised or obsolete forms.)	
REVISIONS PENDING IN MONTH(S).				USE FIRST (Not to exceed 6 months)	
MINOR REVISIONS REQUIRED. (Indicate details on copy.)				DESTROY WHEN NEW STOCK IS AVAILABLE.	
MAJOR REVISIONS REQUIRED. (Submit a completed NRC Form 160, "Request for Forms Management Services," together with a draft of proposed revised form.)				OTHER (Specify)	
OBsolete AND MAY BE DISCONTINUED.					
SIGNATURE – AUTHORIZING OFFICIAL			TELEPHONE NUMBER 415-NNNN		DATE

NRC FORM 162 (5-49)

NRC FORM 162A 5-49 NRCMS 3.55		U.S. NUCLEAR REGULATORY COMMISSION		DATE OF REQUEST MM/DD/YY	
<b>REQUEST FOR REVIEW OF FORM</b>				DUE DATE MM/DD/YY	
<input checked="" type="checkbox"/> SPECIAL – PRIVACY ACT STATEMENT					
TO:  FIRST LAST ORGANIZATION MAIL STOP			FROM AND RETURN TO:  FIRST M. LAST ORGANIZATION MAIL STOP		
FORM NUMBER NRC 000			TELEPHONE 415-NNNN		
EDITION DATE MM/YY			CONTACT FOR THE FORM		
FORM TITLE (Copy attached)  TITLE OF FORM			FIRST LAST ORGANIZATION MAIL STOP		
			TELEPHONE 415-NNNN		
Please review the subject form to ensure the Privacy Act statement is current and its continued use is warranted. Check or complete the following items as appropriate:					
NEW PRIVACY ACT STATEMENT IS REQUIRED.		NO PRIVACY ACT STATEMENT IS REQUIRED.		MAKE MINOR REVISIONS TO EXISTING PRIVACY ACT STATEMENT. (SEE ATTACHED COPY)	
EXISTING PRIVACY ACT STATEMENT IS CURRENT.				REPLACE EXISTING PRIVACY ACT STATEMENT. (SEE ATTACHED COPY)	
SIGNATURE – AUTHORIZING OFFICIAL			TELEPHONE NUMBER 415-NNNN		DATE

NRC FORM 162A (5-49)

### **Exhibit 3**

## **Supporting Statement For An Exception to Automate SF 278**

#### **SUPPORTING STATEMENT FOR AN EXCEPTION TO AUTOMATE SF 278**

The NRC is required to comply with the Ethics in Government Act of 1978, as amended. Pursuant to that Act and Executive Order 12674, the Office of Government Ethics (OGE) (at 5 CFR Part 2634) requires the submission of Public and Confidential Financial Disclosure Reports. The Designated Agency Ethics Official, who is NRC's General Counsel, is responsible for ensuring compliance with the act, the Executive order, and regulations.

Confidential and Public Report filers complete and file a report upon entrance on duty, and annually thereafter. Public filers also complete and file a termination report when they leave the covered position.

The NRC collects approximately 310 Public Reports each year, of which approximately 10 are filed by special government employees. The agency collects approximately 2,300 Confidential Reports each year, with approximately 150 of those being special government employees.

The amount of time spent filling out the forms would be substantially reduced if these forms were available in an electronic format. Individuals could store the completed form on their "P" drive and make necessary changes each year, rather than have to start anew. Moreover, the forms would be easier for NRC's Office of the General Counsel to review, because assets would presumably be listed in the same order as the previous year and there would be no illegible handwriting to decipher.